

In the Matter of)
)
Amendment of Part 97 of the Commission's Rules)
Adding A Tyro License Class... Structuring A Portion) **RM-11829**
of Amateur 70 cm Band... Local Coordinating)
Committees... Insuring Amateur Radio As The Primary)
User on 430-to-440 MHz... And, Adding Scientific)
Research To The Purpose of Amateur Radio)

TO: The Chief, Wireless Telecommunications Bureau, Federal Communications Commission

SUBJECT: Petition for Rule Making by Gary A. Hampton, Amateur Radio Service licensee AD0WU, *et al.* regarding RM-11829.

The commentator, K3URT, is an Extra Class licensee with nearly 25 years of operating experience and is a Volunteer Examiner (VEC) for amateur radio license testing.

- I applauded the Petitioner for the emphasis upon science-based radio and the return to radio education. I also applaud the petitioner for emphasizing on-air etiquette — something badly needed in the amateur radio community. Thumbs up for trying to get younger folks interested in radio communications.

- However, I have to disagree with yet another “incentive” plan for the Amateur Radio Service (ARS). My recent evaluation of ARRL proposed RM-11828 is one suggested criticism of making licensing falsely “easier” for entry-level amateur radio service. As with the Petitioners emphasis, “Elmering” is the way to get the individual mentored and interested in radio or electronics. Unfortunately, my own personal small experience with the age cohort suggested in the Petition, amateur radio or communications, in general, is just not “there” in that age group. Until the education systems adjunct the parents and educators in the sciences, I am afraid the interest will continue to wane. (Many prefer online gaming.) I do not believe the Tyro proposal would mitigate the alleged declining trend or encourage the target sciences. Indeed, US amateur radio licensing is at an all-time high.¹

- The Tyro proposal would sub-divide and complicate the 70 cm band, taking away already earned privileges by licensed ARS. The RM-11829 asks for use of the 430-440 MHz portion of the ARS band using Frequency Modulation (FM) bandwidth mode — a portion already in use by amateur experimenters, simplex operators, weak signal, “sideband” aficionados,

¹ “Total US Amateur Radio Licenses through end of Dec. 2018.” <http://www.clearskyinstitute.com/ham/stats/index.html>. See also <http://www.arrl.org/fcc-license-counts>

contesters, and like. Perhaps the other radio services would give up their frequencies instead?

- RM-11829 addresses the Family Radio Service, General Mobile Radio Service, Citizens Band Radio, Multi-Use Radio Service, etc. — all services that can already address the needs of young and old interested parties. Indeed, the ARS also has ample bands (HF and VHF) for those willing to learn and be tested. (I do not agree the implied VEC testing is intimidating and online testing would be less so. As a VE I have seen every age and character of a person taking the tests. ***The biggest observation is most are not learning the material they are testing on!*** Albeit, this is what the petitioner wants to remedy but this should not be the process suggested.)
- RM-11829 would create another license class. Albeit easier to do online, but online testing is not monitored for cheating, application examination, for identity verification, etc. It also limits the age to eleven years of age, minimum. There are other steps required apart from the other radio services.
- RM-11829 would create another *de facto* radio service on a specific band. The ARS is not like the other services aforementioned. It is purposed for its chartered existence: “The amateur and amateur-satellite services are for qualified persons of any age who are interested in radio technique solely with a personal aim and without pecuniary interest. These services present an opportunity for self-training, intercommunication, and technical investigations. Twenty-seven small frequency bands throughout the spectrum are allocated to this service internationally. Some 1,300 digital, analog, pulse, and spread-spectrum emission types may be transmitted.”
- I suggest a new radio service, non-interfering, separate and with no frequency allocation from the ARS, for this Petition remedy.
- I cannot address the other subjects in the Petitioners long and at times esoteric discussions (particularly his section 3 narratives); nor the predictability of available Tyro sub-band radios from FCC-approved manufacturers (his section 4 narratives).

I “get” what the Petitioner is trying to do: educate and elevate interest in amateur radio for the youth and more, but this is not the instrument of that change. I have to **firmly disagree** with this proposed Rule Making 11829.

Humbly submitted to the Federal Communications Commission and the Amateur Radio Service and community with respect,

/s/ Curt Sanders, K3URT